

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**

SEP 14 2020

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Hughes-Sidney-E.

Johnson, Christopher L.

Plaintiff(s),

vs.

The state-OF-ILLINOIS, And It's  
System OF Employment under  
S.O.R - ILLINOIS - State - Police  
And The City OF Chicago S.O.R  
Registration - Department!

Defendant(s).

**20-cv-05439**  
**Judge Martha M. Pacold**  
**Magistrate Judge Gabriel A. Fuentes**

**COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Hughes-Sidney-E. ) Lewis-Charis ) James Tracy )  
Johnson, Christopher L. ) Alexis-BALLARD- )  
MARTIN - Louis - R ) Way chastity )

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

1. Lewis - CHARLES	21.
2. Alexis-BALLARD alexis Ballard	22.
3. <del>JAMES</del> JAMES - TRACY James, Tracy	23.
4. Martin Louis R. Martin Louis R.	24.
5.	25.
6. ROBERSON SAMMIE ROBERSON	26.
7.	27.
8.	28.
9.	29.
10.	30.
11.	
12.	
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19.	
20.	

4. Defendant, NOT - KNOWN, is  
(name, badge number if known)
- ☒ an officer or official employed by ILLINOIS - STATE - POLICE - AND - CITY - OF - CHICAGO - SO  
(department or agency of government)
- REGISTRATION - DEPARTMENT - (SEX - OFFENSES - REGISTRATION)
- ☐ an individual not employed by a governmental entity.

*If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.*

5. The municipality, township or county under whose authority defendant officer or official acted is THE STATE OF ILLINOIS (COOK - COUNTY). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about CANT - REMEMBER 1995 - 2020, at approximately CANT REMEMBER ☐ a.m. ☒ p.m.  
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of DEPARTMENT - OF - CORRECTION - ILLINOIS, in the County of CANT - REMEMBER, State of Illinois, at ALL - PRISON'S,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows *(Place X in each box that applies)*:

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:  
THREATS - AND - INTIMIDATION



INTimidation AND THREATS TO PRISON'S I.D.O.C., AND IN CHICAGO  
CRUELTY - THREATS USING THEIR POWERS TO ASSUMING NOT THAT OF THE  
TRUTH WHEN THEY HAVE ERRORED UNDER FALSE JUDGMENT

7. Defendant officer or official acted pursuant to a custom or policy of defendant

municipality, county or township, which custom or policy is the following: **(Leave blank**

**if no custom or policy is alleged):** FORCE, USING THREATS AND INTIMIDATION ACT'S  
AT 3510 S. MICHIGAN, CITY OF CHICAGO, ILL REGISTRATION DEPARTMENT,  
WHEN YOU REGISTER, IF YOU ASK FOR INFO THAT YOU DONT UNDERSTAND,  
IT'S THERE WAY OR NO WAY AT ALL !

8. Plaintiff was charged with one or more crimes, specifically:

NOT REGISTERING A CHANGE-OF-ADDRESS, WHEN THEY KNEW YOU DID,  
WE WERE GAVE WARRANT'S BASED ON THERE ERRORS !

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☒ Plaintiff was found guilty of one or more charges because defendant deprived me of a  
fair trial as follows WE HAD TO TAKE A PLEAD-OF-GUILTY, BECAUSE  
OF THERE MISTAKE'S !

☒ Other: THEY KNEW THEY MADE MISTAKE'S, YET THEY COVERED  
IT UP !

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

WE THE PLAINTIFFS, ARE FILING THIS COMPLAINT BASED ON THE ACT  
OF PUNISHMENT GIVEN BY THE STATE-OF-ILLINOIS AND IT'S SYSTEM OF  
EMPLOYMENT UNDER S.O.R. - ILLINOIS-STATE-POLICE AND THE CITY-  
OF CHICAGO S.O.A - REGISTRATION-DEPARTMENT!

IN THE YEAR OF 1995, MANY MEN AND WOMEN WHO HAD BEEN CONVICTED  
OF A CASE UNDER THE ILLINOIS LAW AS A S.O. (SEX-OFFENDER), HAD  
BEEN CALLED TO THE ILLINOIS-DEPARTMENT-OF-CORRECTION'S MEDICAL-ROOM  
(HOSPITAL), WHERE I.D.O.C. OFFICER'S - DOCTOR'S AND NURSE'S WERE  
WAITING FOR OUR ARRIVAL, THEY CALLED US BY NAME AND OUR I.D.O.C.  
NUMBER, THEY THEN TALKED TO US, STATING THAT WE WERE THERE UNDER THE  
STATE-OF-ILLINOIS NEW-LAW AS S.O.'S AND WE WOULD HAVE TO SUBMIT TO A  
D.N.A TEST, MANY HAD TRIED TO EXPLAIN TO THEM THAT THIS LAW DIDN'T  
APPLY TO US, AND THAT WE HAD BEEN IN PRISON SINCE THE 70'S AND 80'S,

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

THREATEN AND INTIMIDATED, BY WORD'S OF PUNISHMENT IF WE DIDN'T  
SUBMIT TO A D.N.A. TEST AND SIGN OUR SIGNATURE TO THE STATE-OF-  
ILLINOIS  
S.O. REGISTRATION LAW!

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No



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we were then told under-force, that if we didn't submit to this D.N.A. test, we would receive a punishment that was recognizable under the law, known as under L.D.O.C. The (Hole) - (Seg) where we would be locked-up and punished if we didn't submit a D.N.A. test, that when we got ready to be released under M.S.R., we would face a punishment - known as the Turn-Around At The Door, and you would be sent to a place where you would stay for the rest-of-your-life, or when a judge state-you-are-cured, that was the only understanding that we were given, we was threatened and under the act of intimidation and that was the only understanding-given, we - surrender and submitted under-(force), and had to take the D.N.A. test and signed our-signature to the state-of-illinois contract under <sup>1-2 OR</sup> 3 year's M.S.A.

and 10 year's under the Ill.-State S.O.-Registration Act, and since the year 1995 this issue has gotten (worse), we now is under a law where we must pay \$100.00 a year, it's call the state's - (Extortion) - law, and if you don't have the money to pay it, you are out of compliance and considered as a (violation) and sent back to prison just to be-(released) again and given 10 more year's or (life)-sentence on S.O.R., this is what we are faced with yearly - to (homeless-weekly), and that is one of the reason's this complaint is being filed under issue's - presented, it's also known that around 20 — The state-of-illinois came up with a new system under-(registering) called (weekly)-Register (meaning), if you was (homeless) or didn't have a (home) or (apartment) you had to (register weekly), knowing they the (state police) and the Chicago Registering-office at 3810 S. Michigan Ave was the cause of many of us losing our-(home) and (apartment's), under a system called (The Red-Zone), (meaning), (you-cant-stay-around-school's-park's-or-day-care-center's) when many of us has stayed around (school's-park's-and-day-care's), many of us has stayed in these community's for year's since the (50's-60's-70's and 80's and 90's) we were forced out of our (home's) and (apartment's) and had to claim - (homeless) under this new system, and if you missed the day that you had to register at 3510 S. Michigan Ave., you was out of (compliance), and there was a (warrant) issued for your-(arrest) with out a reasonable understanding on why you couldn't register that day (meaning) - not knowing if you was (sick) or in a (hospital), or if you didn't have (C.T.A. Busi Fair) and couldn't get a (ride), there was know reasoning or understanding with them under the new system, you would get (arrested) <sup>at</sup> (the police station) on the warrant, sent back to prison, given time, as soon as (it was time to be released, if you had no where to go, or couldn't get housing, you received the new act called the Turn-Around At The Door under L.D.O.C., and had to do your M.S.R. 1-2-or-3 year's M.S.R. to prison, then you receive a (discharge) and told to report to a Registering location-office in the state-of-illinois and would receive (10 more year's) - Extra as punishment, this is and act <sup>TOL</sup>



3/

That is with out a understanding, when you ask for reasons understanding on that subject, you are told to (Shut-up) or they dont want to hear what you got to say, IF you ask what's your classification, you are told dont worry about it, and IF you keep asking (Question's), they will take your Illinois - State - I.D. and tell you to leave or throw it in (The Garbage - CAN) and tell you to get out, you - ARE - NOT - GOING - TO - REGISTER - TODAY, END OF CONVERSATION, and when you come in the next day, they will arrest you on a WARRANT, you are talked to as IF you are a - child or UN-HUMAN, it cause many to Dis Function (Meaning), (To Dis Charge - FORCEFULLY - OR - CONFUSEDLY) and this is a - CONTINUANCE - PROCEEDING Each week at 35<sup>th</sup> and Michigan Registration - Department, also as Punishment that could OF CAUSED - US - OUR - LIFE, due to COVID-19, they packed us in a Bull-Pen with no running water NO - Rest Room AND NO REAL - AIR, they <sup>WERE</sup> Told By The Chicago, Ill MAYOR Lori E. Light Foot to let us out of The Bull-Pen and Discontinual-Registering us at 35<sup>th</sup> and Michigan. AND Due to COVID-19, IN MARCH OF 2020 until Aug. 24<sup>th</sup> 2020 it had BEEN Discontinued, until Aug. 24<sup>th</sup> 2020, we the weekly member's OF NOW CALLED CRIMINAL-Registration would HAVE to CALL IN ON Aug. 24<sup>th</sup> 2020 For Registration - Appointment's we had to CALL (312) 745-5075 OR (312) 745-5292 OR (312) 745-5793 Monday - Friday AT 9: A.M TO 5: P.M, it's HARD TO CALL AND Reach These number's, they ONLY ANSWER when they get ready, and when they DO ANSWER, they only tell you that you will receive A CALL <sup>letting</sup> you know The Day and Time you are to Report to 1-OF-5 OTHER Police station's For Registering - AREA 1 5101 S. Wentworth Ave. - AREA 2 727 E. 111<sup>th</sup> Street - AREA 3 - 2452 W. Belmont Ave. - AREA 4 - 3151 W. Harrison AND AREA-5 - 5555 W. Grand Ave., they ARE ONLY going under this new system, Because they ARE Trying to Hide The FACT that we KNOW COVID-19 IS STILL HIGHLY IN The AIR, people ARE DYING EVERY DAY, it show's that they DONT CARE About us That's weekly Registration, it ALSO<sup>A</sup> Another way OF Trying to stop us From Filing A complaint OR complaint's, they know IF they Split - us - up, they FEEL we cant complaint, Another way OF Punishing us, they KNOW many OF us DONT HAVE phone's OR A way TO COMMUNICATE with them OR HAVE ways TO Get TO these new Location's to Register, we ARE Homeless AND Just CAN AFFORD ENOUGH FOR Food OR A meal EVERY DAY, THERE FOR we must ASK you The court's to PLEASE see it IN our Best Effort How this system HAS EFFECTED our Living condition's AS A way TO CONDEMN US OF OUR PRIVILEGE AS<sup>A</sup> Human's, we ARE That OF PAST-CONVICTION'S who HAS paid FOR our crime many Time's - over TO Society, yet we ARE STILL Being Held Hostage By the system KNOWN AS The State-OF- ILLINOIS, THERE FOR we BRING This complaint TO The court's /

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14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ *(Place X in box if you are seeking punitive damages.)* Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Hughes - Sidney - E.

Plaintiff's name *(print clearly or type)*: Hughes - Sidney - E. JOHNSON CHRISTOPHER L.

Plaintiff's mailing address: P.O. Box 21034

City CHICAGO State ILL. ZIP 60624

Plaintiff's telephone number: (773) 263-2755

Plaintiff's email address *(if you prefer to be contacted by email)*: \_\_\_\_\_

None

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

*If yes, please list the cases below.*

**Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.**

*Sidney E. Hughes*

9-14-2020